

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL JOINT RESPONSES TO
COURT'S QUESTIONS 3 AND 4 FOR
FURTHER HEARING ON MOTION TO
STRIKE ASSERTED TRADE SECRET
NUMBER 96**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
7 Ottomotto, LLC’s Administrative Motion to File Under Seal Joint Responses to Court’s Questions 3
8 and 4 for Further Hearing on Motion to Strike Asserted Trade Secret Number 96 (the “Administrative
9 Motion”). The Administrative Motion seeks an order sealing highlighted portions of the parties’ Joint
10 Responses to Court’s Questions 3 and 4 for Further Hearing on Motion to Strike (“Joint Responses”),
11 as well as the entirety of Exhibit A thereto.

12 3. The portions of the Joint Responses marked in red boxes and the entirety of Exhibit A
13 contain or refer to trade secret information, which Waymo seeks to seal.

14 4. The Joint Responses (portions marked in red boxes in version filed herewith) and
15 Exhibit A (entire document) contain, reference, and/or describe Waymo’s asserted trade secrets or
16 information that, from context, tends to disclose Waymo’s asserted secrets. The information Waymo
17 seeks to seal includes the confidential design and functionality of Waymo’s proprietary autonomous
18 vehicle system, including its LiDAR designs, which Waymo maintains as secret. I understand that
19 these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are
20 valuable to Waymo’s business (Dkt. 25-31). The public disclosure of this information would give
21 Waymo’s competitors access to descriptions of the functionality or features of Waymo’s autonomous
22 vehicle system. If such information were made public, I understand that Waymo’s competitive
23 standing would be significantly harmed.

24 5. Waymo’s request to seal is narrowly tailored to those portions of the Joint Responses
25 and Exhibit A that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on September 11, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.
11

12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven
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